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**COUNSEL TO BVLY PARTNERS CLTZ TYVOLA, LLC
AND BVLY PARTNERS CLTZ WILKINSON, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§ Chapter 11
	§
ZIPS CAR WASH, LLC, <i>et al.</i> , ¹	§ Case No. 25-80069 (MVL)
Debtors.	§
	§ (Jointly Administered)

**NOTICE OF APPEAL BY BVLY PARTNERS CLTZ TYVOLA, LLC AND BVLY
PARTNERS CLTZ WILKINSON, LLC**

BVLY Partners CLTZ Tyvola, LLC and BVLY Partners CLTZ Wilkinson, LLC (collectively, “Appellants”), creditors and landlords in the above-referenced bankruptcy cases, pursuant to 28 U.S.C. § 158(a) and Federal Rule of Bankruptcy Procedure 8001, *et seq.*, appeal to the United States District Court for the Northern District of Texas the *Order Denying BVLY Partners CLTZ Tyvola, LLC and BVLY Partners CLTZ Wilkinson, LLC’s Motion for Relief*

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification numbers, are Zips Car Wash, LLC (3045); Express Car Wash Holdings, LLC (6223); Zips 2900 Wade Hampton, LLC (N/A); Zips 3107 N. Pleasantburg, LLC (N/A); Zips 6050 Wade Hampton, LLC (N/A); Zips Operating Holdings, LLC (2161); Zips Portfolio I, LLC (9999); Zips Portfolio II, LLC (1864); Zips Portfolio III, LLC (N/A); and Zips Portfolio IV, LLC (N/A). The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is 8400 Belleview Drive, Suite 210, Plano, Texas 75024.

from the Automatic Stay to Remove the Debtor from Leased Premises entered on April 28, 2025 [Dkt. No. 400] (the “Order”). The Order denied the Appellants’ *Motion for Relief from the Automatic Stay to Remove the Debtor from Leased Premises* [Dkt. No. 137]. A true and correct copy of the Order is attached hereto as Exhibit A and incorporated herein by reference. The parties to this appeal and their counsel are identified below:

Parties	Counsel
Creditors-Appellants BVLY Partners CLTZ Tyvola, LLC and BVLY Partners CLTZ Wilkinson, LLC	<p>Meagan Martin Powers Martin Powers & Counsel, PLLC 1431 Greenway Drive, Suite 950 Irving, TX 75038 Direct: 214-612-6471 Fax: 214-247-1155 meagan@martinpowers.com</p> <p>Andrew W.J. Tarr Patrick H. Hill (admitted pro hac vice) Robinson, Bradshaw & Hinson, P.A. 600 South Tryon Street, Suite 2300 Charlotte, NC 28202 Telephone: (704) 377-2536 atarr@robinsonbradshaw.com phill@robinsonbradshaw.com</p>
Debtor-Appellee Zips Car Wash, LLC	<p>GRAY REED Jason S. Brookner (TX Bar No. 24033684) Aaron M. Kaufman (TX Bar No. 24060067) Amber M. Carson (TX Bar No. 24075610) 1601 Elm Street, Suite 4600 Dallas, Texas 75201 Telephone: (214) 954-4135 Facsimile: (214) 953-1332 Email: jbrookner@grayreed.com akaufman@grayreed.com acarson@grayreed.com</p> <p>KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP Joshua A. Sussberg, P.C. (pro hac vice) Ross J. Fiedler (pro hac vice) 601 Lexington Avenue</p>

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Dated: May 12, 2025

Respectfully submitted,

/s/ Meagan Martin Powers

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**COUNSEL TO BVLY PARTNERS CLTZ
TYVOLA, LLC AND BVLY PARTNERS CLTZ
WILKINSON, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2025, I caused a copy of the foregoing document to be served by Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Meagan Martin Powers

Meagan Martin Powers

EXHIBIT A



CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

A handwritten signature in cursive script, reading "Michelle V. Larson".

Signed April 25, 2025

United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

ZIPS CAR WASH, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-80069 (MVL)
)
) (Jointly Administered)
)
) **Re: Docket Nos. 137, 272, 273, 362,**
) **370**

**ORDER DENYING BVLY PARTNERS CLTZ TYVOLA, LLC AND
BVLY PARTNERS CLTZ WILKINSON, LLC'S MOTION FOR RELIEF FROM
THE AUTOMATIC STAY TO REMOVE THE DEBTOR FROM LEASED PREMISES**

Upon *BVLY Partners CLTZ Tyvola, LLC and BVLY Partners CLTZ Wilkinson, LLC's*
Motion for Relief from the Automatic Stay to Remove the Debtor from Leased Premises
[Docket No. 137] (the "Motion"), filed by BVLY Partners CLTZ Tyvola, LLC and BVLY

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification numbers, are Zips Car Wash, LLC (3045); Express Car Wash Holdings, LLC (6223); Zips 2900 Wade Hampton, LLC (N/A); Zips 3107 N. Pleasantburg, LLC (N/A); Zips 6050 Wade Hampton, LLC (N/A); Zips Operating Holdings, LLC (2161); Zips Portfolio I, LLC (9999); Zips Portfolio II, LLC (1864); Zips Portfolio III, LLC (N/A) and Zips Portfolio IV, LLC (N/A). The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 8400 Belleview Drive, Suite 210, Plano, Texas 75024.

Partners CLTZ Wilkinson, LLC (collectively, the “Movants”); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Motion, the Debtors’ Objection to the Motion [Docket No. 272] (the “Objection”), and the Movants’ Reply in Support of the Motion [Docket No. 362]; and this Court having admitted into evidence and considered the Declaration of David Head in Support of the Motion [Docket No. 137-1] and Exhibits 1-13 attached thereto, the Supplemental Declaration of David Head in Support of the Motion [Docket No. 362-2] and Exhibits 14-16 attached thereto, the Declaration of Sophie Teague in Support of the Motion [Docket No. 362-1] and Exhibits 17-18 attached thereto, the Declaration of Kevin Nystrom, Chief Transformation Officer of Zips Car Wash, LLC, in Support of the Objection [Docket No. 273] and Exhibit 1 attached thereto, and the Joint Stipulation of Facts Regarding the Motion [Docket No. 370]; and upon the hearing on the Motion on April 23, 2025 (the “Hearing”), it is HEREBY ORDERED THAT:

1. For the reasons stated on the record during the Hearing, the Motion is denied.
2. The Court’s bench ruling issued at the Hearing is hereby fully incorporated by reference herein.

END OF ORDER

Submitted by:

GRAY REED

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